



intercede in the BON process to have her “defamatory and unwarranted ‘Discipline History’ expunged from her Pennsylvania nursing license record” She makes this request citing no statutory authority, no defined right, no evidence of lack of process, and, most importantly, she misrepresents and/or misunderstands the status of the BON proceedings. The request is untimely and unsubstantiated, and the Court should decline to involve itself in the matter. Defendants adopt the arguments set forth in their brief in support of this Response

Respectfully submitted,

Attorneys for Defendants,

/s/Michael E Kennedy

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this motion, the brief in support and the proposed court order were served upon the Plaintiff on November 17 2017, by first class US mail to her record address:

3342 west 12<sup>th</sup> street, Erie PA 16505.

Attorneys for Defendants,

/s/Michael E Kennedy

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